

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ICONTROL NETWORKS, INC.)	
)	
Plaintiff,)	Civil Action No. 1:13-cv-834-LMB/IDD
)	
v.)	
)	JURY TRIAL DEMANDED
ALARM.COM INCORPORATED;)	
FRONTPPOINT SECURITY SOLUTIONS, LLC)	
)	
Defendants.)	
)	
)	
)	
)	

**DECLARATION OF MARY A. PROCACCIO-FLOWERS IN SUPPORT OF
PLAINTIFF ICONTROL NETWORKS, INC.'S RESPONSE TO DEFENDANTS'
MOTION TO SEAL**

I, Mary A. Procaccio-Flowers, declare as follows:

1. I am an attorney of the law firm of Wilson Sonsini Goodrich & Rosati, counsel for Plaintiff iControl Networks, Inc. ("iControl"). I am admitted to the bar in the State of California, and I am admitted *pro hac vice* in this case. I make this declaration on my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. Attached to Joint Motion To Dismiss Count 1 of the Complaint for Lack of Standing (Doc. No. 79) ("Motion to Dismiss") is the deposition of one of iControl's principals that contains testimony concerning the private transfer of rights and ownership of, among other things, one of the patents at issue.

3. The information contained in the deposition testimony referred to in paragraph 2 is not generally known to the public and the disclosure of it would cause competitive harm to iControl.

4. The specific information that Alarm.com seeks to seal is proprietary and relates to information concerning the ownership of patent rights that has not been made public by iControl.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on November 13, 2013 in Palo Alto, California.

Mary A. Procaccio-Flowers

Mary A. Procaccio-Flowers

Dated: November 13, 2013

Respectfully submitted,

/s/ Stephen E. Noona

Stephen E. Noona
Virginia State Bar No. 25367
Mark E. Warmbier
Virginia State Bar No. 77993
Matthew B. Chmiel
Virginia State Bar No. 65334
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510-1665
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
Email: mewarmbier@kaufcan.com
Email: senoona@kaufcan.com
Email: mbchmiel@kaufcan.com

James C. Yoon (*pro hac vice*)
Ryan R. Smith (*pro hac vice*)
Alyssa N. Knutson (*pro hac vice*)
Mary Procaccio-Flowers (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811
Email: jyoon@wsgr.com
Email: rsmith@wsgr.com
Email: aknutson@wsgr.com
Email: mprocaccioflowers@wsgr.com

Counsel for Plaintiff iControl Networks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Marc Khadpe (*pro hac vice*)
Teena-Ann Sankoorikal (*pro hac vice*)
Daniel Weinstein (*pro hac vice*)
Andrei Harasymiak (*pro hac vice*)
Roger Brooks (*pro hac vice*)
Stefan Howard Atkinson (*pro hac vice*)
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone: 212-474-1000
Facsimile: 212-474-3700
Email: mkhadpe@cravath.com
Email: tsankoorikal@cravath.com
Email: dweinstein@cravath.com
Email: aharasymiak@cravath.com
Email: rgbrooks@cravath.com

Dabney J. Carr, IV
Robert A. Angle
TROUTMAN SANDERS LLP
P.O. Box 1122
Richmond, Virginia 23218-1122
dabney.carr@troutmansanders.com
roberts.angle@troutmansanders.com

Counsel for Defendant Alarm.com, Inc.

Michael A. Oakes
Virginia State Bar No. 42745
Alysa N. Youngson
Virginia State Bar No. 82838
HUNTON & WILLIAMS LLP
2200 Pennsylvania Avenue, N.W.
Washington, DC 20037
Telephone: (202) 955-1500
Facsimile: (202) 778-2201
moakes@hunton.com
ayoungson@hunton.com

*Counsel for Defendant FrontPoint Security
Solutions, LLC*

/s/ Stephen E. Noona

Stephen E. Noona
Virginia State Bar No. 25367
Mark E. Warmbier
Virginia State Bar No. 77993
Matthew B. Chmiel
Virginia State Bar No. 65334
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510-1665
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
Email: mewarmbier@kaufcan.com
Email: senoona@kaufcan.com
Email: mbchmiel@kaufcan.com

James C. Yoon (*pro hac vice*)
Ryan R. Smith (*pro hac vice*)
Alyssa N. Knutson (*pro hac vice*)
Mary Procaccio-Flowers (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811
Email: jyoon@wsgr.com
Email: rsmith@wsgr.com
Email: aknutson@wsgr.com
Email: mprocaccioflowers@wsgr.com

Counsel for Plaintiff iControl Networks, Inc.